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Attorney for Mr. Joel Jimenez-Polanco

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE DANA M. SABRAW)

UNITED STATES OF AMERICA,) CASE NO. 08CR0016-DMS
Plaintiff,) DATE: February 15, 2008
v.) TIME: 11:00 a.m.
JOEL JIMENEZ-POLANCO) NOTICE OF MOTIONS AND
Defendant.) MOTIONS:
) (1) TO COMPEL DISCOVERY;
) (2) FOR LEAVE TO FILE
) FURTHER MOTIONS

TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND
LUELLA MENDOZA CALDITO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on February 15, 2008, at 11:00 a.m. or as soon
thereafter as counsel may be heard, the defendant, Joel Jimenez-Polanco, by and through
counsel, Zandra Lopez, will ask this Court to enter an order granting the following motions.

MOTIONS

The defendant, Joel Jimenez-Polanco, by and through counsel, Zandra Lopez, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

1 1) to compel discovery; and,
2 2) for leave to file further motions.

2 These motions are based upon the instant motions and notice of motions, the attached
3 statement of facts and memorandum of points and authorities, and all other materials that
4 may come to this Court's attention at the time of the hearing on these motions.
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6 Respectfully submitted,
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7 //s// Zandra L. Lopez
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8 Dated: February 1, 2008
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9 **ZANDRA L. LOPEZ**
10 Attorney for Mr. Jimenez-Polanco
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